

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re

Harjit Kaur
1318 Bluewater Drive
Chester, VA 23836
SSN/ITIN: xxx-xx-9994,

Case No. 16-31442-KRH
Chapter 7

Debtor(s).

**NOTICE OF THIRD MOTION TO EXTEND TIME
(1) TO OBJECT TO DISCHARGE AND (2) TO FILE A
MOTION TO DISMISS PURSUANT TO 11 U.S.C. § 707**

PLEASE TAKE NOTICE THAT the United States Trustee has filed with the Court a **Third Motion To Extend Time (1) To Object To Discharge And (2) To File A Motion To Dismiss Pursuant To 11 U.S.C. § 707** (the "Motion") in the above-captioned case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, then on or before **March 15, 2017**, you or your attorney must:

(X) File with the Court, at the address below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. You must mail or otherwise file it early enough so the Court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street – Suite 4000
Richmond, Virginia 23219

You must also mail a copy to:

Shannon Pecoraro, Trial Attorney
Office of the United States Trustee
701 East Broad Street - Suite 4304
Richmond, VA 23219

Robert B. Van Arsdale, AUST (Va. Bar No. 17483)
Shannon Pecoraro, Esq. (Va. Bar No. 46864)
Office of the United States Trustee
701 East Broad Street - Suite 4304
Richmond, VA 23219
Telephone (804) 771-2310
Facsimile (804) 771-2330

(x) Attend a hearing, which may be scheduled at a later date. You will receive a separate notice of hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the relief requested.

JUDY A. ROBBINS
United States Trustee
Region Four

Date: March 1, 2017

/s/ Shannon Pecoraro
Shannon Pecoraro, Trial Attorney
Office of the United States Trustee
701 East Broad Street - Suite 4304
Richmond, VA 23219
Telephone (804) 771-2310
Facsimile (804) 771-2330

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2017, a true copy of the foregoing was served via electronic mail pursuant to the Administrative Procedures of the CM/ECF System for the United States Bankruptcy Court for the Eastern District of Virginia to all necessary parties. In addition, a copy was mailed to the following:

Harjit Kaur
1318 Bluewater Drive
Chester, VA 23836

/s/ Shannon Pecoraro
Shannon Pecoraro, Esq.
Trial Attorney

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re

Harjit Kaur,

Debtor(s).

Case No. 16-31442-KRH
Chapter 7

**THIRD MOTION TO EXTEND TIME TO (1) OBJECT TO DISCHARGE
AND (2) TO FILE A MOTION TO DISMISS PURSUANT TO 11 U.S.C. § 707**

COMES NOW JUDY A. ROBBINS, the United States Trustee for the Eastern District of Virginia (the "U.S. Trustee"), through the undersigned counsel and pursuant to §§ 707 and 727 of 11 U.S.C. §§ 101, *et seq.* (the "Bankruptcy Code") and Bankruptcy Rules 1017(e)(1), 4004, 4007 and 9006(b) of the Federal Rules of Bankruptcy Procedure, hereby requests this Court to extend the time to object to the above-captioned Debtor's (the "Debtor") discharge and to extend time to file a motion to dismiss this case. In support of this request, the U.S. Trustee states as follows:

1. This is a core proceeding concerning the administration of this estate pursuant to 28 U.S.C. §157(b)(2)(A) and 28 U.S.C. § 1334.
2. On or about March 23, 2016, the Debtor filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code.
3. Peter J. Barrett (the "Chapter 7 Trustee") was appointed trustee and continues to serve as trustee in this bankruptcy case.
4. The U.S. Trustee has had discussions with Debtor's counsel about this case.
5. Debtor's counsel advises that the Debtor has agreed to a dismissal of her case with prejudice.

Robert B. Van Arsdale, Esq., AUST (Va. Bar No. 17483)
Shannon Pecoraro, Esq. (Va. Bar No. 46864)
Office of the United States Trustee
701 East Broad Street - Suite 4304
Richmond, VA 23219
Telephone (804) 771-2310
Facsimile (804) 771-2330

6. On February 8, 2017, Debtor's counsel filed a Motion to Dismiss Case with Prejudice and is scheduled for hearing on March 8, 2017.

7. Because an order has not yet been entered dismissing the case, the U.S. Trustee seeks this extension out of an abundance of caution.

8. The adjourned § 341 hearing is scheduled for March 13, 2017, which is after the expiration of the current deadlines under §§ 707(b) and 727.

9. Based upon the above, the U.S. Trustee requests an extension of time to file a motion to dismiss this case pursuant to Bankruptcy Code § 707 and/or to object to the Debtor's discharge pursuant to Bankruptcy Code § 727.

10. In the Schedules of Assets and Liabilities (the "Schedules"), the Debtor lists total unsecured debt of \$471, 645.00.

11. On Schedule I, the Debtor lists total gross monthly income of \$1,500.00 and Combined Average Monthly Income of \$1,255.00.

12. The circumstances set forth above constitute sufficient cause for granting the requested extension of time.

13. There have been two extensions of time filed in this case and the deadline expires March 1, 2017.

WHEREFORE, the U.S. Trustee requests this Court to extend the date to file a motion to dismiss pursuant to Bankruptcy Code § 707 and/or to object to the Debtor's discharge pursuant to Bankruptcy Code § 727 through and including, March 31, 2017, and for such other relief as this Court deems just.

Respectfully requested

JUDY A. ROBBINS
United States Trustee
Region Four

Date: March 1, 2017

By: /s/ Shannon Pecoraro
Shannon Pecoraro
Trial Attorney

CERTIFICATE OF SERVICE

I do hereby certify that on March 1, 2017, a true copy of the foregoing was served via electronic mail pursuant to the Administrative Procedures of the CM/ECF System for the United States Bankruptcy Court for the Eastern District of Virginia to all necessary parties. In addition, a copy was mailed to the following:

Harjit Kaur
1318 Bluewater Drive
Chester, VA 23836

/s/ Shannon Pecoraro
Shannon Pecoraro, Esq.
Trial Attorney
Office of the United States Trustee
701 East Broad Street - Suite 4304
Richmond, VA 23219
Telephone (804) 771-2310
Facsimile (804) 771-2330

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re

Harjit Kaur,

Case No. 16-31442-KRH

Chapter 7

Debtor(s).

**THIRD ORDER EXTENDING TIME (1) TO FILE A COMPLAINT
TO OBJECT TO THE DISCHARGE AND (2) TO FILE A
MOTION TO DISMISS PURSUANT TO 11 U.S.C. § 707**

This matter came before the Court upon the United States Trustee's Third Motion To Extend Time (1) To Object To Discharge And (2) To File A Motion To Dismiss Pursuant To 11 U.S.C. §707 (the "Motion"), and it appearing that due notice was given and that good cause exists to grant the relief sought in the Motion, it is hereby ORDERED:

1. The Motion is GRANTED.
2. Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.
3. The last day to file a complaint to object to the above captioned Debtor's discharge or to file a motion to dismiss this case is extended through and including March 31, 2017.
4. Upon entry, the Clerk is directed to send a copy of this Order to all parties on the service list attached hereto.

DATE

KEVIN R. HUENNEKENS
BANKRUPTCY JUDGE
UNITED STATES BANKRUPTCY COURT

Robert B. Van Arsdale, Esq., AUST (Va. Bar No. 17483)
Shannon Pecoraro, Esq. (Va. Bar No. 46864)
Office of the United States Trustee
701 East Broad Street - Suite 4304
Richmond, VA 23219
Telephone (804) 771-2310
Facsimile (804) 771-2330

I ask for this:

/s/ Shannon Pecoraro
Shannon Pecoraro, Esq.
Office of the United States Trustee
701 East Broad Street - Suite 4304
Richmond, VA 23219

CERTIFICATION

I hereby certify that this Order has been either served on or endorsed by all necessary parties.

/s/ Shannon Pecoraro
Shannon Pecoraro, Esq.

SERVICE LIST

Harjit Kaur
1318 Bluewater Drive
Chester, VA 23836

William R. Baldwin, III, Esq.
Thorsen, Honey, Baldwin & Meyer LLC
5600 Grove Avenue
Richmond, VA 23226-2102

Rudolph C. McCollum, Jr., Esq.
P.O. Box 4595
Richmond, VA 23220

Peter J. Barrett, Chapter 7 Trustee
Kutak Rock LLP
1111 E. Main Street, Suite 800
Richmond, VA 23219

Shannon Pecoraro, Esq.
Trial Attorney
Office of the United States Trustee
701 East Broad Street - Suite 4304
Richmond, VA 23219